

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

PUREWICK CORPORATION, )  
Plaintiff/Counterclaim Defendant, )  
v. ) C.A. No. 19-1508-MN  
SAGE PRODUCTS, LLC, )  
Defendant/Counterclaim Plaintiff. )

**PLAINTIFF'S MOTIONS FOR ENHANCED DAMAGES, PERMANENT INJUNCTION,  
ONGOING ROYALTIES, SUPPLEMENTAL DAMAGES, PRE-JUDGMENT AND  
POST JUDGMENT INTEREST AND JUDGMENT ON DEFENDANT'S  
COUNTERCLAIMS**

Plaintiff PureWick Corporation (“PureWick”), by and through its undersigned counsel, respectfully moves as follows:

1. for Enhanced Damages pursuant to 35 U.S.C. §284;
2. for a Permanent Injunction against Sage's making, using, selling, offering to sell, or importing into the United States, of the PrimaFit product and any products not more than colorably different than the PrimaFit product;

3. for Ongoing Royalties on Sage's future sales of the PrimoFit product and any products not more than colorably different than the PrimoFit product;

4. for Supplemental Damages;
5. for Pre-Judgment Interest;
6. for Post Judgment Interest; and
7. for judgment on Defendant's counterclaims of unenforceability and invalidity.

The grounds for these motions are set forth in Plaintiff's Opening Brief In Support Of Its Post-Trial Motions.

OF COUNSEL:  
Steven C. Cherny  
Raymond Nimrod  
Brian P Biddinger  
Matthew A. Traupman  
Nicola R. Felice  
Jason C. Williams  
Bianca Fox  
QUINN EMANUEL URQUHART  
& SULLIVAN, LLP  
51 Madison Ave., 22nd Floor  
New York, NY 10010

Athena Dalton  
QUINN EMANUEL URQUHART  
& SULLIVAN, LLP  
191 N. Wacker Drive, Suite 2700  
Chicago, IL 60606  
(312) 705-7400

*/s/ Andrew E. Russell*

---

John W. Shaw (No. 3362)  
Andrew E. Russell (No. 5382)  
SHAW KELLER LLP  
I.M. Pei Building  
1105 North Market Street, 12th Floor  
Wilmington, DE 19801  
(302) 298-0700  
jshaw@shawkeller.com  
arussell@shawkeller.com  
*Attorneys for Plaintiff*

Dated: May 5, 2022